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May 20, 2019

**Via Electronic Filing**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: GN Docket No. 17-183**  
**ET Docket No. 18-295**  
**Notice of Ex Parte Presentation**

Dear Ms. Dortch:

On May 16, 2019, Jerry Roberts of Enterprise Products and President of the Energy Telecommunications and Electrical Association (“ENTELEC”) and the undersigned, met with staff from the Commission’s Office of Engineering and Technology to discuss the Notice of Proposed Rulemaking in the above-referenced dockets proposing to allow unlicensed devices to operate in the 6 GHz band.<sup>1</sup>

During the meeting, we described the importance of 6 GHz point-to-point microwave links to critical infrastructure operations. Consistent with comments in this proceeding filed by the Critical Infrastructure Coalition, we reiterated our position that the Commission should not introduce unlicensed devices to the 6 GHz band.

Should the Commission proceed with its proposal, it must ensure point-to-point operations are protected from interference. Automated frequency coordination requirements should be placed only on unlicensed devices, not on Part 101 licensees. In addition, any use of automated frequency coordination must prevent interference in cases of unlicensed device malfunction including through security and backup measures.

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<sup>1</sup> See Unlicensed Use of the 6 GHz Band; Expanding Flexible Use in Mid-Band Spectrum between 3.7 and 24 GHz; *Notice of Proposed Rulemaking*, ET Docket No. 18-295, GN Docket No. 17-183 (Rel. Oct. 24, 2018).

## KELLER AND HECKMAN LLP

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Pursuant to Section 1.1206(b) of the Commission's Rules, 47 C.F.R. § 1.1206(b), a copy of this letter is being filed electronically for inclusion in the public record of this proceeding. Please contact the undersigned if you have any questions.

We look forward to continuing to work with the Commission on this matter.

Sincerely,

/s/

Wesley K. Wright  
Gregory E. Kunkle

CC: Michael Ha  
Paul Murray  
Bahman Badipour  
Hugh Van Tuyl  
Karen Rackley  
Nick Oros  
Ira Keltz  
Michael Ha  
Nadja Sodos-Wallace